

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN)
---	-----------------------

This document relates to:

*Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq et. al.*, 1:04-cv-01076 (GBD)(SN)

*Estate of John P. O'Neill, Sr., et al. v. Al Baraka Investment and Development Corporation, et. al.*, 1:04-cv- 01923 (GBD)(SN)

*Audrey Ades, et al. v. Islamic Republic of Iran*, 1:18-cv-07306 (GBD)(SN)

*Allison Garger, et al. v. Kingdom of Saudi Arabia*, 1:18-cv-11950 (GBD)(SN)

*Celestine Kone, et al. v. Islamic Republic of Iran*, 1:23-cv-05790 (GBD)(SN)

**MOTION TO SUBSTITUTE PARTIES PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 15(d)**

Pursuant to Federal Rules of Civil Procedure 15(d), Plaintiffs herein move the Court to allow substitution of the parties as identified in Exhibit A in the above referenced actions. The individuals being substituted into the cases are the Personal Representatives of individuals killed as a result of the terrorist attacks on September 11, 2001 (a “9/11 decedent”).

Exhibit A identifies the individuals to be substituted in the pleading, including the capacity in which they seek to be substituted, state of residency at the time the complaint was filed, the existing pleading that refers to the plaintiff, and the decedent of which the plaintiff is the Personal Representative.

Plaintiffs propose that, upon endorsement of Plaintiffs’ Proposed Order, the substituted parties be individually entered as a Plaintiff into the Court’s ECF system to ease the burden on the Clerk of the Court’s Office and the size of this MDL.

Dated: April 8, 2025

*/s/ Jerry S. Goldman*

---

Jerry S. Goldman, Esq.

Bruce E. Strong, Esq.

Alexander Greene, Esq.

ANDERSON KILL P.C.

7 Times Square, 15<sup>th</sup> Floor

New York, NY 10036

Tel: (212) 278-1000

Fax: (212) 278-1733

Email: [jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)

[bstrong@andersonkill.com](mailto:bstrong@andersonkill.com)

[agreene@andersonkill.com](mailto:agreene@andersonkill.com)

**EXHIBIT A to Motion to Substitute Parties**

	<b>Previous Personal Representative:</b>	<b>Case Number:</b>	<b>Substituted Personal Representative:</b>	<b>State of Residency of Substituted Personal Representative at Filing:</b>	<b>Decedent's Name:</b>
1.	John Doe 102, being intended to designate the Estate of Nehamon Lyons, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Nehamon Lyons	No. 1:04-cv-01923 (GBD)(SN)	Gregory Taylor as the Personal Representative of the Estate of Nehamon Lyons, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Nehamon Lyons	AR	Nehamon Lyons
2.	John Doe 102, being intended to designate the Estate of Nehamon Lyons, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or	No. 1:04-cv-01076 (GBD)(SN)	Gregory Taylor as the Personal Representative of the Estate of Nehamon Lyons, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Nehamon Lyons	AR	Nehamon Lyons

	having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Nehamon LyonsMarquis Lyons, individually, as surviving sibling of Nehamon Lyons				
3.	Jewel Lyons as the Personal Representative of the Estate of Nehamon Lyons, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Nehamon Lyons	No. 1:18-cv-07306 (GBD)(SN); No. 1:18-cv-11950 (GBD)(SN)	Gregory Taylor as the Personal Representative of the Estate of Nehamon Lyons, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Nehamon Lyons	AR	Nehamon Lyons
4.	Kristen Graf, as the Personal Representative of the Estate of Edwin J. Graf, III, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Edwin J. Graf, III	No. 1:23-cv-05790 (GBD)(SN); No. 1:04-cv-01923 (GBD)(SN)	Susan Fennell being intended to designate the Personal Representative of the Estate of Edwin J. Graf, III, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a	NC	Edwin J. Graf, III

		court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Edwin J. Graf, III		
--	--	---	--	--